



Driving Trucking's Success

February 3, 2003

Docket Management System
U. S. Department of Transportation
Research and Special Programs Administration
400 Seventh Street, SW, Room PL 401
Washington, DC 20590-0001

Re: Harmonization with the United Nations Recommendations, International Maritime Dangerous Goods Code, and International Civil Aviation Organization's Technical Instructions: RSPA-2002-13658 (HM-215E)¹

To Whom It May Concern:

The American Trucking Associations, Inc. ("ATA") is pleased to submit these comments in response to the Notice of Proposed Rulemaking referenced above.² ATA supports the Research and Special Programs Administration's ("RSPA") proposal to improve safety and facilitate international commerce by aligning the hazardous materials regulations with applicable international standards. We offer our comments on the following three aspects of the Proposed Rule:

A. *Requirement to identify a subsidiary hazard on shipping papers.*

ATA supports the proposed requirement to enter the subsidiary hazard class or subsidiary division number(s) in parenthesis following the primary hazard class on the shipping paper. We believe that this requirement will improve safety and compliance

¹ 67 *Federal Register* 72034 (December 3, 2002) ("Proposed Rule").

² ATA is a united federation of motor carriers, state trucking associations, and national trucking conferences created to promote and protect the interests of the trucking industry. Its membership includes more than 2,000 trucking companies and industry suppliers of equipment and services. Directly and through its affiliated organizations, ATA represents over 34,000 companies and every size, type and class of motor carrier operation, including motor carriers that transport hazardous materials and hazardous wastes in intrastate, interstate and foreign commerce.

with the hazardous materials regulations by facilitating a motor carrier's ability to comply with the hazardous materials separation and placarding requirements.

B. *Requirement to indicate the types of packagings on shipping papers.*

ATA supports RSPA's proposal to require shippers to indicate on shipping papers the total quantity of hazardous materials, including the types of packages such as drums, boxes, etc., being used to transport hazardous materials. (49 C.F.R. 172.202(a)(5)). We believe that RSPA should allow a 24-month delay in the effective date of this requirement to minimize the impacts this revision will have upon existing computer-based shipping programs, electronic databases, and preprinted forms.

C. *Alternative basic description sequence on shipping papers.*

ATA does not support RSPA's proposed requirement to allow an alternative to the basic description sequence on the hazardous materials shipping paper. (49 C.F.R. §172.202(b)). While we appreciate the agency's intention to provide flexibility, we believe that a single standardized format for all shipping papers is critical to the motor carriers' ability to effectively train their employees and assure compliance with the hazardous materials regulations.

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If you have any questions concerning these comments, please contact the undersigned at (703) 838-1910.

Respectfully submitted,

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